

In addition to the lack of any productive sales force, the record shows, through Plaintiffs' own witnesses, that the general economic downturn in the U.S. economy in general and in the paper industry in particular, as well as the September 11, 2001 tragedy, and the anthrax scare, further contributed to the loss of sales at Oles, LLC and OEC. Vicki Young depo., Exh. 1, at pp. 187-90, 231-33, 331-35. While Plaintiffs may indeed be correct in alleging that their decision to close Oles LLC was the result of a significant decrease in sales, the evidentiary record does not contain an iota of evidence that the fact that Defendants were no longer with the company caused the loss of one customer or one sale of Oles LLC. Without such evidence, Plaintiffs' causation theory fails.

Defendants also ignore (and do not offer evidence to rebut) that the loss of sales and the demise of Oles LLC was caused, at least in part, by poor management at Oles LLC following the departure of Robinson and Oechsle. Even prior to the departure of Robinson, Plaintiffs made the decision to place Vicki Young, Jay Young's daughter, in the position of Vice President and General Manager of Oles LLC, effective April 1, 2001. Ms. Young had never run a jet shop or printing business before, had never been a general manager of any company, and had no management experience with regard to running a print production shop. Jay Young depo., Exh. 2, at pp. 297-298, 300. During the time that Ms. Young ran Oles LLC, sales decreased very significantly. Vicki Young depo., at pp. 186-187.¹⁰

In their Response, Plaintiffs do no more than try to take advantage of the timing of Robinson's and Oechsle's departures (in February and June 2001) to argue that the drop in sales (starting in September 2001) and the demise of the company must have been the result of Robinson and Oechsle no longer running the company. However, Plaintiffs have not proffered *any* evidence to support this

¹⁰ Mr. Young admitted that Ms. Young was responsible for increasing the sales of Oles LLC and that, during her tenure at Oles LLC, sales in fact did not increase. Jay Young depo., Exh. 2, at p. 301. OEC's chief financial officer testified that, by 2002, Oles LLC's "profits had eroded because sales had eroded [and] [s]ales had decreased so greatly" and that "there was a fairly precipitous drop . . . [in sales in] the late summer, early fall of 2001." Moderacki depo., Exh. 3, at p. 375. In fact, Oles LLC's sales suffered a huge drop from September 2001 through the time the business was closed, representing a 56.2% decrease from the prior year when Robinson and Oechsle were still running the business. Supplemental Expert Report of Stephen W. Oliner, Exhibit 23 at p. 4.